



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 15, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

The Government respectfully seeks redactions to the defendant's letter motion seeking testimony of Jack Scarola, Brad Edwards, and Robert Glassman, and the sealing of Exhibit 1 to that letter (Dkt. No. 544). The Government's proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the letter and exhibit are judicial documents subject to the common law presumption of access, the limited proposed redactions and sealing are narrowly tailored to protect the privacy interests of a Minor Victim who is subject of the Court's pseudonym order.

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Respectfully submitted,

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Cc: Defense Counsel (By ECF)